

深圳市粤鑫贵金属有限公司

Shenzhen Yuexin Precious Metals Co., Ltd.

部门管理制度

Department Management System

文件名称：反洗钱规章制度

Document name: Anti-Money Laundering Rules and Regulations

文件编号：YXG/W-009-2021

Document No.: YXG/W-009-2021

版本：A

Version: A

编制：郭亚文

Prepared by: Guo Yawen

审核：王镇城

Reviewed by: Wang Zhencheng

批准: 蔡海涛

Approved by: Cai Haitao

生效日期: 2021-7-1

Effective date: July 1, 2021

第一章 总 则

Chapter 1 General Provisions

第一条 为规范本公司的反洗钱工作,提高本公司防范洗钱风险的能力,维护国家经济秩序和金融安全,根据《中华人民共和国反洗钱法》等法律法规和《中国人民银行关于加强贵金属交易场所反洗钱和反恐怖融资工作的通知》《上海黄金交易所反洗钱和反恐怖主义融资工作管理办法》等规定,制定本办法。

Article 1 To regulate the Company's anti-money laundering work, improve the Company's ability to prevent money laundering risks and maintain the national economic order and financial security, these Measures are formulated in accordance with the *Anti-Money Laundering Law of the People's Republic of China* and other laws and regulations, the *Notice by the People's Bank of China of Enhancing the Efforts of Precious Metal Trading Venues to Combat Money Laundering and Financing of Terrorism* as well as the *Measures for the Management of Anti-money Laundering and Anti-terrorist Financing of Shanghai Gold Exchange*.

第二条 本公司对代理客户反洗钱工作实行自律管理。本公司负责组织代理客户的反洗钱业务培训及宣传教育工作,向上海黄金交易所反映代理客户对反洗钱工作的意见和建议。

Article 2 The Company conducts self-discipline management on the anti-money laundering work of its agent clients. The Company is responsible for organizing anti-money laundering business training, publicity and education for agent clients, and report the clients' opinions and suggestions

on anti-money laundering to Shanghai Gold Exchange.

第三条 代理客户应当按照法律法规、国家机关部门规章和本办法的要求，积极履行反洗钱义务，维护黄金行业信誉。

Article 3 Agent clients should actively perform their anti-money laundering obligations and maintain the reputation of gold industry in accordance with laws and regulations, rules of state authorities and departments and the requirements of these Measures.

第四条 本办法适用于本公司开户的所有代理客户。

Article 4 These Rules and Regulations apply to all agent clients who open accounts in the Company.

第二章 组织保障与职责分工

Chapter 2 Organizational Guarantee and Division of Responsibilities

第五条 本公司严格执行国家法律法规、中国人民银行监管规定和上海黄金交易所管理规定，将反洗钱工作落实到本公司内部控制制度和日常业务运作中。

本公司负责人对本单位的反洗钱合规管理负最终责任。

Article 5 The Company strictly implements the national laws and regulations and the supervision regulations of the People's Bank of China and management regulations of Shanghai Gold Exchange, and implements the anti-money laundering work into the internal control system and daily business operation of the Company. The person in charge of the Company bears the ultimate responsibility for the anti-money laundering compliance management of the Organization.

第六条 本公司设立专门反洗钱负责机构负责反洗钱工作，指定专人负责反洗钱合规管理工作，并报告上海黄交易所。本公司负责人对反洗钱内部控制制度的有效实施负责。

Article 6 The Company should set up a special anti-money laundering agency responsible for anti-money laundering, designate a special person to be responsible for anti-money laundering compliance management, and report to Shanghai Gold Exchange. The person in charge of the Company is responsible for the effective implementation of the internal control system of anti-money laundering.

会员单位应对其分支机构的反洗钱工作进行统一管理。

Organizations with membership shall conduct unified management of the anti-money laundering work for their branches.

第七条 本公司反洗钱负责机构履行下列职能：

Article 7 The agency in charge of anti-money laundering of the Company should perform the following functions:

（一）指定本公司反洗钱内部控制制度、操作规程，根据反洗钱要求制定或修订所涉及相关业务规则；

(I) Determining the internal control system and operating procedures of anti-money laundering of the Company and formulating or revising relevant business rules according to anti-money laundering requirements;

（二）根据法律法规以及本单位内部控制制度的规定开展反洗钱工作；

(II) Carrying out anti-money laundering work in accordance with laws and regulations and the internal control system of the Company;

- (三) 对反洗钱工作提供技术支持与保障, 按规定报送大额和可疑交易数据;
- (III) Providing technical support and guarantee for anti-money laundering work and submitting large-amount and suspicious transaction data as required;
- (四) 配合国家有关执法机关对涉嫌洗钱活动的调查取证工作;
- (IV) Cooperating with the relevant national law enforcement authorities in the investigation and evidence collection of suspected money laundering activities;
- (五) 负责与监管机关、上海黄金交易所进行反洗钱工作的协调与沟通工作;
- (V) Coordinating and communicating with regulatory authorities and Shanghai Gold Exchange on anti-money laundering;
- (六) 组织反洗钱法律法规和有关知识技能的培训和宣传工作;
- (VI) Organizing the training and publicity of anti-money laundering laws and regulations and relevant knowledge and skills;
- (七) 与反洗钱相关的其他工作。
- (VII) Other work related to anti-money laundering.

第八条 本公司按上海黄金交易所反洗钱工作要求建立健全反洗钱、反恐怖融资内控制度体系, 并将贵金属相关内部控制制度向上海黄金交易所报告。

Article 8 The Company should establish and improve the internal control system of anti-money laundering and anti-terrorism financing according to the anti-money laundering requirements of Shanghai Gold Exchange, and report the internal control system related to precious metals to Shanghai Gold Exchange.

第三章 会员身份识别

Chapter 3 Membership identification

第九条 本公司遵循“了解你的客户”原则, 针对具有不同洗钱或者恐怖融资风险特征的客户、业务关系或者交易应当采取相应的客户身份识别措施, 了解客户及其交易目的和交易性质, 了解客户资金的来源和性质, 了解实际控制客户的自然人和交易的实际受益人。

Article 9 The Company observes the principle of “Know your Clients”, in which the corresponding identification measures should be taken for customers, client relations or transactions with different risk characteristics of money laundering or terrorist financing, so as to learn the clients and their purposes and nature of transactions, the source and nature of the client's fund, the natural person of clients as well as the actual beneficiaries of transactions.

第十条 本公司及其工作人员应当勤勉尽责, 切实履行客户身份识别义务, 预防洗钱风险。

Article 10 The Company and its staff shall be diligent and responsible to earnestly carry out the obligation of identification and prevent money laundering risks for the clients.

本公司不得为身份不明的客户提供服务, 不得为客户开立匿名账户或者假名账户, 不得允许客户借用他人账户办理业务。

The Company shall not provide services for undisclosed customers, open anonymous or pseudonymous accounts for clients, or allow customers to handle the business by borrowing others' accounts.

本公司在为任何客户提供服务时, 都应当要求其提供真实有效的身份证件或者其他身份

证明文件，相关单位和个人有义务配合会员工作。

When providing services to any client, the Company shall require the client to provide real and effective identity certificates or other identity documents. The relevant organizations and individuals are obliged to cooperate with the member's work.

第十一条 客户申请开户时，应当要求开户人出具有效证照等文件，应对客户出具的文件进行核对、登记，并将上述身份证明文件的复印件或者影印件和授权委托书原件存档。

Article 11 When there are clients applying to open accounts, the Company shall require the account holder to provide valid certificates, check and register the documents provided by the clients and file the copies or photocopies of abovementioned identification documents, as well as the original copies of power of attorney.

涉及增值税税票的机构开户申请，应严格执行《上海黄金交易所发票管理办法》要求提供相关资料。

For the application for account opening involving VAT tax receipts, the relevant information shall be provided in strict accordance with the *Measures for the Management of Invoice of Shanghai Gold Exchange*.

第十二条 对于客户委托指令下达人、资金调拨人、结算单确认人，应当要求客户出具授权委托书及上述代理人的有效身份证件并进行核对，登记代理人的姓名或者名称、联系方式，并将授权委托书原件及身份证明文件的复印件或者影印件存档。

Article 12 For the people who send down entrustment order, allocate fund or confirm documents of settlement of clients, it is required to ask the clients to provide and check the power of attorney and the valid identity certificates of the abovementioned agents, register the names or designation, contact information of the agents, and file the original copies of power of attorney and copies or photocopies of identity documents.

第十三条 应根据身份识别需要可以要求客户对资金及其来源的合法性进行说明，并要求客户提供相关证明文件。

Article 13 Based on the requirements of identification, it is needed to require the clients to explain the validity of their fund and the source of fund, and request the clients to provide relevant identification documents.

第十四条 应对客户登记的黄金交易账户进行审查，确保黄金交易账户、资金账户的名称与客户身份证明文件的名称一致。

Article 14 It is required to investigate the gold transaction accounts of the clients, ensuring the name of gold transaction account and fund account in line with the name of clients' identification documents.

第十五条 应当按照客户的特点或者账户的属性划分风险等级，在持续关注的基础上，适时调整风险等级。

Article 15 It is required to divide the risk grade based on the characteristics of clients or the attribute of their accounts. Based on sustained concern, the risk grade should be timely adjusted.

应对不同客户采取相应的客户尽职调查及其他风险控制措施。其中，对高风险客户应采取强化的风险控制措施，以有效预防风险。

It is required to conduct corresponding due diligence as well as other risk control measures for different clients. Among them, intensified risk control measures should be taken for high-risk clients to effectively prevent risks.

第十六条 对于具有下列情形之一的客户，应按照上海黄金交易所要求在反洗钱工作中进行重点关注：

Article 16 For clients under any of the following circumstances, it is required to pay special attention to them with regard to the anti-money laundering management in accordance with the requirements of Shanghai Gold Exchange:

(一) 客户（及其实际控制人或实际受益人）被列入我国发布或承认的应实施反洗钱监控措施的名单；

(I) The clients (and their actual controllers or actual beneficiaries) who are included into the list of monitoring measures of anti-money laundering which should be taken, issued or acknowledged by China;

(二) 客户（及其实际控制人或实际受益人）为外国政要及其亲属、关系密切人；

(II) The clients (and their actual controllers or actual beneficiaries) are the relatives or close persons of foreign dignitaries;

(三) 客户多次涉及本公司向中国人民银行反洗钱监测分析中心报送的可疑交易报告；

(III) Clients who are involved in the suspicious transaction reports submitted by the Company to the Anti-Money Laundering Monitoring and Analysis Center of the People's Bank of China for many times.

(四) 客户拒绝会员单位依法开展客户尽职调查工作；

(IV) Clients who refuse the member organization to conduct law-based customer due diligence.

(五) 其他认为存在相对较高的洗钱风险和恐怖融资风险，需要重点关注的客户。

(V) Clients who are with other money laundering risks and terrorist financing risks with great potential and thus needed to be closely monitored.

第十七条 在与客户的业务关系存续期间，应当采取持续的客户身份识别措施，关注客户及其日常交易情况，及时提示客户更新资料信息。

Article 17 Within the duration of business relationship with clients, it is required to take consistent identification measures for clients' identity, focus on the clients and their daily

客户先前提交的身份证件货真身份证明文件已过有效期的，应当要求客户进行更新。客户没有在合理期限内更新且没有提出合理理由的，应当按照法律法规或与客户事先约定，对客户采取相应的限制措施。

If the identity documents or identification documents submitted previously by the clients are expired, it is needed to require the clients to extend the validity. If the clients do not update the validity and do not propose reasonable grounds, it is required to take corresponding limitation measures for the clients in line with laws and regulations or by making prior appointment with the clients.

第十八条 在为客户办理业务过程中，发现客户所提供的个人身份证件或机构资料涉嫌虚假记载的，应当拒绝办理；发现存在可疑之处的，应当要求客户补充提供个人身份证件或机构原件等足以证实其身份的相关证明材料，无法证实的，应当拒绝办理。

Article 18 During handling business for clients, if it is found that the personal identity documents or organization information are/is suspected of being involved in false record, the Company should refuse to handle the business. If there is something suspicious, the Company shall require the customer to additionally provide the individual identity documents or the original copies of organizations, as well as other relevant identification materials which can prove the clients' identity.

第十九条 除核对有效身份证件或者其他身份证明文件外，可以采取以下一种或者几种措施，识别或者重新识别客户身份：

Article 19 Except for checking valid identity documents or other kinds of identity documents, it is allowed to take one/several of the following measures to identify or re-identify the identity of clients.

(一) 要求客户补充其他身份资料或者身份证明文件;

(I) The clients are required to supplement other identity information or identification documents;

(二) 回访客户;

(II) Pay return visits to clients;

(三) 实地查访;

(III) On-site investigation;

(四) 向公安、工商行政管理等部门核实;

(IV) Check from departments including police or industrial and commercial administration;

(五) 其他可依法采取的措施。

(V) Other law-based measures.

第四章 可疑交易报告

Chapter 4 Suspicious Transaction Report

第二十条 开展代理业务时,采取银行转账方式。采取银行转账方式时,应当使用交易客户的同名银行账户;发生退款的,应当按原支付途径,将资金退回原付款客户的银行账户。

Article 20 When implementing agency business, the Company should adopt bank transfer for payment. In the case of bank transfer, the bank account with the same name of the transaction clients shall be applied; Where there are refunds, the funds shall be returned to the bank account of the clients with the original payment in accordance with the original payment.

第二十一条 发现或者有合理理由怀疑客户、客户的资金或者其他资产、客户的交易或者试图进行的交易与洗钱、恐怖融资等犯罪活动相关的,不论所涉资金金额或者资产价值大小,应当再确认可以交易后立即向中国反洗钱监测分析中心报送可疑交易报告,确有必要时可同时报告上海黄金交易所。

Article 21 If it is found or there are reasonable grounds to suspect that the client, the client's funds or other assets, the transaction or attempted transaction of the client is related to money laundering, terrorist financing and other criminal activities, regardless of the amount of funds or the value of assets involved, the suspicious transaction report shall be immediately submitted to the China Anti-money Laundering Monitoring and Analysis Center after reconfirming that the transaction can be made. If necessary, it is allowable to report the situations to Shanghai Gold Exchange at the same time.

第二十二条 可疑交易符合下列情形之一的,在向中国反洗钱监测分析中心报送可疑交易报告的同时,应当以电子形式或者书面形式向所在地中国人民银行分支机构、公安机关或者国家安全机关报案:

Article 22 If the suspicious transaction meets one of the following circumstances, when submitting suspicious transaction reports to the China Anti-money Laundering Monitoring and Analysis Center, the Company shall report the situations electronically or in written means to the local branch of the People's Bank of China, the public security organizations or the state security

administrations:

1. 明显涉嫌洗钱、恐怖融资等犯罪活动的;
1. Where there is obvious suspicion of criminal activities such as money laundering and terrorist financing;
2. 严重危害国家安全或者影响社会稳定的;
2. Where it seriously endangers the state security or influences social stability;
3. 其他情节严重或者情况紧急的情形。
3. Other serious or emergent circumstances.

第二十三条 应当采取必要的监控措施,对国家有权机关公布的恐怖活动组织及恐怖活动人员名单等进行监测,不得与名单上的任何实体、组织或者个人建立业务关系,或者为其提供任何形式的服务,对与恐怖活动组织和人员等有关的资金或者其他资产,依法立即采取冻结措施,并按照规定及时向所在地公安机关、国家安全机关和中国人民银行分支机构报告。

Article 23 It is required to take necessary monitoring measures to monitor the list of terrorist organizations and terrorist personnel publicized by the state authorities. The Company shall not establish business relations with or provide services for any entities, organizations or persons on the lists. For fund or other assets related to the terrorist organizations and personnel, it is required to immediately take freezing measures in line with the laws and report the situations to local public security organizations, state security administrations and branches of the People's Bank of China based on the provisions.

第五章 会员身份资料和交易记录保存

Chapter 5 Storage of Membership Information and Transaction Records

第二十四条 应当妥善保存客户身份资料和交易记录,保存方式和保存期限按照国家有关规定执行。

Article 24 It is required to properly store the identity information and transaction records for clients. The storage methods and storage life should be conducted in line with the relevant national provisions.

客户身份资料包括但不限于客户的开户资格证明文件复印件或影印件、代理人的身份证件复印件或影印件、授权书原件、账户开立内部审核记录、客户信息核实和更正记录等。

The identity information of clients includes but is not limited to the copies or photocopies of the clients' qualification certificate for account opening, the copies or photocopies of the agents' identity certificates, the original letter of authorization, internal audit records of account opening, client information verification and modification records, etc.

交易记录包括但不限于关于每笔交易的数据信息、业务凭证、账簿以及有关规定要求的反映交易真实情况的合同、业务凭证、单据、业务函件和其他资料。

The transaction records include but are not limited to the information including data information, business vouchers, account books of each transaction, as well as contracts, business vouchers, bills, business letters etc. required by relevant provisions which reflects the truth of the transaction.

第二十五条 应当按照有关法律法规的规定，保存反洗钱工作档案、反洗钱报告等资料，保存方式和保存期限按照相关规定执行。

Article 25 Documents such as working files of anti-money laundering and anti-money laundering reports shall be kept in accordance with relevant laws and regulations, and the preservation method and period shall comply with relevant provision.

保管期届满，凡涉及涉嫌洗钱未查清的有关资料，包括客户身份资料和交易记录、反洗钱报告等，应单独保管到事项完结为止。

Upon the expiration of the storage period, the relevant information related to suspected money laundering that has not been checked up, such as customer identity information, transaction records and anti-money laundering reports, etc., shall be kept separately until the completion of the item.

第二十六条 本公司及其工作人员对依法履行反洗钱和反恐怖融资义务获得的客户身份资料、交易信息及其他工作信息予以保密，除法律法规另有规定外，不得向任何单位和个人提供。

Article 26 The Company and its staff shall maintain the confidentiality of the identity information, transaction information and other business information of clients obtained by performing the obligations of anti-money laundering and anti-terrorist financing in line with the laws. Unless otherwise stipulated by laws and regulations, the Company shall not provide such information to any organization or individual.

第六章 保密管理和培训教育

Chapter 6 Confidentiality Management and Training Education

第二十七条 应积极参与上海黄金交易所组织的反洗钱培训。

Article 27 It is necessary to actively participate in the anti-money laundering training organized by Shanghai Gold Exchange.

第二十八条 应对工作人员进行反洗钱培训，增强反洗钱工作能力。反洗钱培训内容包括：

Article 28 Anti-money laundering training should be carried out for staff to enhance their anti-money laundering ability. Anti-money laundering training includes:

（一） 有关法律法规；

(I) Relevant laws and regulations;

（二） 内部控制制度、操作规程和控制措施

(II) Internal control system, operating procedures and control measures

（三） 相关专业知识和技能。

(III) Relevant professional knowledge and skills.

第二十九条 有义务将与交易所业务有关的反洗钱和反恐怖融资各项法律法规、管理制度及交易所公告的规定告知代理客户，并应当加强对代理客户履行反洗钱和反恐怖融资责任和义务的管理与指导，以确保反洗钱、反恐怖融资相关责任和义务落到实处。

Article 29 It is obliged to inform the agent clients of the laws, regulations, management systems and provisions announced by the exchange on anti-money laundering and anti-terrorism financing related to the business of the exchange. Besides, the management and guidance on the

agent clients' performance of anti-money laundering and anti-terrorism financing responsibilities and obligations should be strengthened to ensure that the anti-money laundering and anti-terrorism financing-related responsibilities and obligations are implemented.

第三十条 应当加强对客户及潜在客户进行反洗钱宣传，提高客户对反洗钱工作的认识。

Article 30 The anti-money laundering publicity should be strengthened for clients and potential clients to improve their understanding of anti-money laundering.

第三十一条 可以自主或与国家有关部门、上海黄金交易所共同对社会进行反洗钱宣传，提高公众的反洗钱意识

Article 31 The anti-money laundering publicity to the society can be carried out independently or with the relevant national authorities to raise the public's awareness of anti-money laundering

第三十二条 在有关执法机关在对可疑客户侦察调查期间，严格做好保密工作，不通风报信。

Article 32 During the investigation of suspicious clients by relevant law enforcement authorities, it is necessary to strictly keep secrets and not furnish secret information.

第七章 反洗钱协查

Chapter 7 Anti-Money Laundering Investigation Assistance

第三十三条 应当依法协助、配合司法机关和行政执法机关打击洗钱活动。发现业内涉嫌洗钱活动线索，应当依法向反洗钱行政主管部门、侦察机关举报。

Article 33 It is necessary to assist and cooperate with judicial authorities and administrative law enforcement authorities in combating money laundering activities according to law. If any clue of suspected money laundering activities is found in the industry, such a situation should be reported to the anti-money laundering competent administrative department and the investigation authority according to law.

应当积极配合中国人民银行及其分支机构依法进行的反洗钱调查，不得拒绝、阻碍反洗钱调查，不得谎报、隐匿、销毁相关证据材料。

It is necessary to actively cooperate with the People's Bank of China and its branches in the anti-money laundering investigation conducted according to law. It is forbidden to refuse or obstruct the anti-money laundering investigation, falsely report, conceal or destroy relevant evidence materials.

第三十四条 在接受反洗钱检查时，有义务按照要求真实、完整、及时、准确地提供所需要的资料，并提供有效协助。对于拒不配合检查工作或者提供虚假情况造成检查结果严重失实的，将依据会员管理相关规定进行问责。对于检查中发现的问题，被查单位应当落实有效措施及时整改。

Article 34 At the time of accepting the anti-money laundering inspection, it is obliged to provide the required information truthfully, completely, timely and accurately as required, and provide effective assistance. For those who refuse to cooperate with the inspection or provide false information, resulting in the serious inconsistency of the inspection results with the facts, the corresponding responsibility should be investigated according to the relevant provisions of

membership management. For the problems found in the inspection, the inspected organization should implement effective measures to rectify them in a timely manner.

第八章 监督与问责

Chapter 8 Supervision and Accountability

第三十五条 上海黄金交易所依据监管要求和相关管理规定对会员单位的贵金属反洗钱工作进行定期和不定期的检查。

Article 35 The Shanghai Gold Exchange should conduct regular and irregular inspections on the precious metal anti-money laundering work of the member organizations in accordance with regulatory requirements and relevant management regulations.

第三十六条 应制定考核奖惩措施，对积极、主动开展反洗钱工作的部门及个人给予适当的奖励措施；对内部违反中国人民银行、上海黄金交易所及本公司反洗钱有关规定的行为进行处理，对公司工作人员协助进行洗钱活动的，给予开除处分，涉及犯罪的，移交司法机关依法处理。

Article 36 Assessment, reward and punishment measures should be formulated and appropriate reward measures should be given to departments and individuals who proactively and actively carry out anti-money laundering work. The internal violations of the relevant provisions of the People's Bank of China, Shanghai Gold Exchange and the Company on anti-money laundering should be investigated. If the staff of the Company assists in money laundering activities, he should be dismissed. If a crime is involved, he will be handed over to the judicial authorities for handling according to law.

应将本公司有关贵金属反洗钱监管处罚情况、违规情况及处理结果报告上海黄金交易所。

The regulatory penalties, violations and handling results of the anti-money laundering of precious metals of the Company should be reported to Shanghai Gold Exchange.

第三十七条 应将反洗钱工作开展情况纳入本公司的稽核审计、检查或评估范围。反洗钱稽核审计、检查或评估内容应当考虑以下方面：

Article 37 The implementation of anti-money laundering should be included in the scope of audit, inspection or assessment of the Company. The anti-money laundering audit, inspection or assessment should consider the following aspects:

（一）反洗钱组织机构设置、反洗钱岗位人员配置及履行职责情况；

(I) Anti-money laundering organization setup, anti-money laundering post staffing and performance of duties;

（二）反洗钱内控制度建立及执行情况；

(II) Establishment and implementation of the internal control system of anti-money laundering;

（三）客户身份识别和尽职调查情况；

(III) Identification and due diligence of clients

（四）大额交易报告和可疑交易报告情况；

(IV) Large transaction reports and suspicious transaction reports

（五）客户身份资料和交易记录保存情况；

(V) Identity information and transaction record keeping of clients;

（六）反洗钱业务培训和宣传情况；

(VI) Anti-money laundering training and publicity;

(七) 配合司法机关、行政机关打击洗钱活动及涉嫌洗钱犯罪信息移送情况;

(VII) Situation about cooperating with judicial and administrative authorities in combating money laundering activities and situation about information transfer of suspected money laundering crimes;

(八) 其他相关工作内容。

(VIII) Other relevant work contents.

第三十八条 上海黄金交易所以“日常监测、现场检查、定期自评、年度总评”为原则对会员单位反洗钱工作进行考核,采取现场和非现场相结合,根据考核结果给予表彰奖励或采取处罚措施。

Article 38 Shanghai Gold Exchange should assess the anti-money laundering work of the member organizations based on the principle of “daily monitoring, on-site inspection, regular self-assessment and annual general assessment”. The on-site and off-site measures should be adopted. In addition, commendations and rewards should be given or punishment measures should be taken according to the assessment results.

第三十九条 本公司及代理客户违反监管机构和上海黄金交易所反洗钱、反恐怖融资管理规定的,上海黄金交易所根据严重程度,可视情况采取责令改正、谈话、责令参加培训、口头警告、通报批评、限制开新仓、限制持仓额度、暂停交易1至6个月、暂停或限制某项业务,直至取消会员资格的处罚措施。

Article 39 Where the Company and its agent clients violate the anti-money laundering and anti-terrorism financing management regulations of the regulatory authority and Shanghai Gold Exchange, Shanghai Gold Exchange may take the punishment measures of order for correction, talk and training, verbal warning, circulation of a notice of criticism, restrictions on the opening of new positions and the quota of the position held, suspension of transactions for 1 to 6 months, suspension or restriction of a certain business, or even cancellation of the membership depending on the seriousness of the violation.

第九章 附 则

Chapter 9 Supplementary Provisions

第四十条 本规章制度以中文书写,任何其他语种和中文版本之间产生歧义的,以最近的中文文本为准。本公司与代理客户签署的业务相关文件、协议、合同等一应法律文书均以中文文本为准。

Article 40 These Rules and Regulations are written in Chinese. In case of any ambiguity between any other language and the Chinese version, the latest Chinese version shall prevail. The Chinese version shall prevail regarding business documents, agreements, contracts and other legal documents signed between the Company and the agent clients.

第四十一条 本规章制度所称的反洗钱规定,是指国家法律法规、部门规章中涉及贵金属交易场所的反洗钱规定及监督要求。本规章制度所称本公司是指上海黄金交易所综合类会员深圳市众恒隆实业有限公司。

Article 41 The anti-money laundering provisions referred to in these Rules and Regulations refer to the anti-money laundering provisions and supervision requirements related to trading

venues of precious metals in national laws, regulations and departmental rules. The Company referred to in these Rules and Regulations refers to Shenzhen ZHL Industrial Co.,Ltd., which is one of the comprehensive members of Shanghai Gold Exchange.

第四十二条 如反洗钱法律法规以及中国人民银行和上海黄金交易所的相关规定比本办法的要求更为严格的，本公司应遵守其规定。

Article 42 If the anti-money laundering laws and regulations as well as the relevant provisions of the People's Bank of China and Shanghai Gold Exchange are more stringent than the requirements of these Rules and Regulations, the Company should comply with them.

第四十三条 本办法解释权属于深圳市众恒隆实业有限公司。

Article 43 Shenzhen ZHL Industrial Co.,Ltd. reserves the right to interpret these Rules and Regulations.

第四十六条 本办法自发布之日起生效

Article 46 These Rules and Regulations shall come into force as of the date of promulgation

会员单位：深圳市粤鑫贵金属有限公司

Member organization: Shenzhen Yuexin Precious Metals Co., Ltd.

联系人：王镇城

Liaison person: Wang Zhencheng

联系电话：0755-28510489

Contact number: 0755-28510489

日期：2020 年 3 月 28 日

Date: March 28, 2020